

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JUDY LARSON, BARRY HALL, JOE MILLIRON, TESSIE ROBB and WILLIE DAVIS, individually and on behalf of all others similarly situated,

Plaintiff,

-against-

AT&T MOBILITY LLC f/k/a CINGULAR WIRELESS LLC and SPRINT NEXTEL CORPORATION and SPRINT SPECTRUM L.P. d/b/a SPRINT NEXTEL and NEXTEL FINANCE COMPANY,

Defendants.

No. 2:07-cv-05325-JLL-ES

[PROPOSED] ORDER

This matter having been brought before the Court by Kelley Drye & Warren LLP, counsel for defendants Sprint Nextel Corporation, Sprint Spectrum L.P. d/b/a Sprint Nextel and Nextel Finance Company (collectively, “Defendants”); by way of motion for entry of an Order to Show Cause (based on the accompanying Memorandum of Law and supporting Declaration pursuant to Local Rule 65.1) to stay any further prosecution of *In re Cellphone Termination Fee Cases*, JCCP 4332 (the “California Subscriber Class Case”) currently pending in the Alameda County Superior Court, State of California and on appeal before the Court of Appeals of the State of California First Appellate District, Division

Five, No. A128026 (the “California Appeal”) and *Robertson v. Nextel Commc’ns, Inc.*, Case No. RG03114214, Calif. Super. Ct., Alameda County (“Robertson”) (collectively referred to as the “California Litigations”); and their counsel, Scott A. Burson of Burson & Fisher, P.A.; Alan R. Plutzik and Jennifer S. Rosenberg of Bramson, Plutzik, Mahler & Birkhaeuser, LLP; J. David Franklin of Franklin & Franklin; Adam Gonnelli of Faruqi & Faruqi, LLP; David Pastor of Gilman and Pastor, LLP; Anthony A. Ferrigno of Law Offices of Anthony A. Ferrigno; Joshua Davis of the Law Offices of Joshua Davis; and Marc G. Reich of Reich Radcliffe LLP for the *Robertson* Class; and Scott A. Burson and L. Timothy Fisher of Burson & Fisher, P.A.; Alan R. Plutzik of Bramson, Plutzik, Mahler & Birkhaeuser, LLP; and J. David Franklin of Franklin & Franklin for the California Subscriber Class and the California Appeal (collectively referred to as the “Burson Group”), from prosecuting any further proceedings that could result in any ruling or judgment that would conflict with this Court’s Final Judgment or otherwise interfere with this Settlement and this Court’s continuing jurisdiction over the Settlement Class because this Court’s protection of the Final Judgment and its effectiveness may be impaired and/or jeopardized by virtue of the activities set forth in Sprint’s submissions; and in furtherance and in aid of this Court’s continuing jurisdiction over the Class Settlement; and in order to protect and effectuate its Final Judgment; and it is

IT IS on this ____ day of July, 2012:

ORDERED that Defendants' Motion is GRANTED; and it is further

ORDERED that the California Litigations are stayed and the Burstor

Group is restrained and enjoined from prosecuting any further proceedings that could result in any ruling or judgment that would conflict with this Court's Final Judgment or otherwise interfere with this Settlement and this Court's continuing jurisdiction over the Settlement Class.

IT IS SO ORDERED

Dated: _____, 2012

Honorable Jose L. Linares, U.S.D.J.